

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS**

<b>UNITED STATES OF AMERICA</b>	<b>*</b>	<b>CRIMINAL DOCKET NO.</b>
<b>v.</b>	<b>*</b>	<b>SECTION:</b>
<b>CHARLES DAVID THONN</b>	<b>*</b>	<b>VIOLATION: 18 U.S.C. § 641</b>

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The United States Attorney charges that:

**COUNT 1**

**A AT ALL TIMES MATERIAL HEREIN:**

1. Prior to August and September of 2005 and through the present, the defendant, **CHARLES DAVID THONN (THONN)**, resided at and used as his primary residence a home at which he lived with his wife located at 2342 Corinne Avenue in Chalmette, Louisiana, in the Eastern District of Louisiana.

2. Prior to August and September of 2005, **THONN'S** parents owned a home located at 50892 Chef Menteur Highway, New Orleans, Louisiana. **THONN**, a commercial fisherman, used this residence to store his fishing boat.

3. Hurricane Katrina made landfall in Louisiana on August 29, 2005, and caused

widespread damage to the Gulf Coast region of Louisiana, including the New Orleans area.

4. Pursuant to an act of Congress of the United States of America with the concurrence and agreement of the President of the United States, funds were appropriated to the Department of Housing and Urban Development (“HUD”), an agency and department of the United States, for a Community Development Block Grant (“CDBG”) for Louisiana hurricane victims. The purpose of this CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program (the “Program”). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the Program.

5. One of the major requirements for receiving grant money from the Program was that the damaged property be the primary residence of the applicant on August 29, 2005.

6. On or about September 20, 2006, **THONN** applied for a Louisiana Road Home grant to obtain funds for the property located at 50892 Chef Menteur Highway in New Orleans. In his application, **THONN** stated that he was separated from his wife and that the Chef Menteur Highway property was his primary residence.

7. On or about September 20, 2007, **THONN** was awarded a Louisiana Road Home grant in the amount of \$80,368.00 which was deposited into a bank account maintained by **THONN**.

#### **B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS**

1. From on or about September 2006 to on or about September, 2007, in the Eastern District of Louisiana, the defendant, **CHARLES DAVID THONN**, did willfully and knowingly

steal, purloin and convert to his own use, money and funds of the United States Department of Housing and Urban Development, an agency and department of the United States, by falsely and fraudulently obtaining a payment of United States Department of Housing and Urban Development Community Development Block Grant funds administered by the State of Louisiana and the Louisiana Road Home Program in the amount of approximately \$80,368.00 for which he knew he was not entitled; all in violation of Title 18, United States Code, Section 641.

### **NOTICE OF FORFEITURE**

1. The allegations in Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provision of Title 18, United States Code, Section 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Count 1 defendant, **CHARLES DAVID THONN**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 641.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

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New Orleans, Louisiana  
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